

**BY COURIER**

Michelle Kerr  
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May 22, 2012

**Re: General Notice and Information Request for the Chemetco Superfund Site in Hartford, Illinois –  
Response of United Non-Ferrous Trading Ltd.**

Dear Ms. Kerr:

Please find enclosed the Response of United Non-Ferrous Trading Ltd. ("UNFT") to the United States Environmental Protection Agency's ("EPA") Request for Information pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act regarding the Chemetco Superfund Site in Hartford, Illinois.

UNFT's Response is based on the current state of UNFT's knowledge concerning the issues raised in the EPA's Request for Information. UNFT reserves the right to supplement or modify this Response should additional or different information become available. Further, UNFT is not and shall not be deemed to be making any admission or waiver, including but not limited to with respect to liability or jurisdiction, by virtue of this Response or otherwise. Finally, UNFT reserves all defenses, privileges, rights, immunities and objections in connection with this matter.

Please direct all future correspondence regarding this matter to:

Sahand Boorboor  
Associate  
Allen & Overy LLP  
1221 Avenue of the Americas  
New York, NY 10020

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Email: sahand.boorboor@allenoverly.com

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Please feel free to contact me or Sahand Boorboor with any questions regarding this submission.

Kind regards,

A handwritten signature in black ink, appearing to read 'Ken Rivlin', with a stylized flourish at the end.

**Ken Rivlin**  
Partner

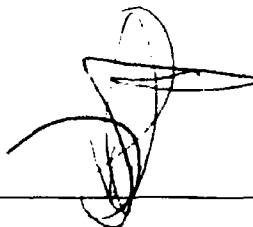
Encl



**CERTIFICATION OF UNITED NON-FERROUS TRADING LTD.**

**EPA Information Request for the Chemetco Superfund Site**

I certify that this document and all enclosures were prepared under my direction. The information submitted is to the best of my knowledge and belief, true, accurate, and complete.



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***DI Assets S.A. permanent represented by  
Cornelis Leo Steenbergen***

***Director***

United Non-Ferrous Trading Ltd  
May 11, 2012

**Information Request  
Response**

**General Notice and Information Request for the  
Chemetco Superfund Site in Hartford, Illinois**

**Response from United Non-Ferrous Trading Ltd.**

1. Provide the following information about your company ("Respondent"):

- (a) The complete and correct legal name of your company.

**RESPONSE:**

United Non-Ferrous Trading Ltd. ("UNFT")

- (b) The name(s) and address(es) of the President and the Chairman of the Board, or other presiding officer of the company.

**RESPONSE:**

DI Assets S.A.  
Represented by Cornelis Leo Steenbergen  
Le Dome Espace Pétrusse  
2 Avenue Charles de Gaulle  
Lu-1653 Luxembourg  
GD Luxembourg

- (c) The state of incorporation of the company and the company's agents for service.

**RESPONSE:**

UNFT is incorporated in Hong Kong under registration number 0542480, with its registered address at:

Room 1901, 19/F., Hua Fu Commercial Building  
111 Queen's Road West  
Sheung Wan, Hong Kong

UNFT does not have any agents for service of process in the United States.

- (d) The name(s) of all subsidiaries, affiliates, or parent companies to your company.

**RESPONSE:**

Information regarding UNFT's shareholders is attached hereto in Appendix 1. A structure chart of UNFT's subsidiaries, and certain of its affiliates and parent companies is attached hereto as Appendix 2.

- (e) The state of incorporation and agents for service of process in the state of incorporation.

**RESPONSE:**

None of UNFT nor any of its subsidiaries, affiliates or parent companies has an agent for service of process in the United States.

Information regarding UNFT's shareholders is attached hereto in Appendix 1. A structure chart of UNFT's subsidiaries, and certain of its affiliates and parent companies is attached hereto as Appendix 2.

- (f) The status of all subsidiaries, affiliates, or parent companies to your company.

**RESPONSE:**

All subsidiaries, affiliates, and parent companies of UNFT are in good standing.

2. Describe and provide any documents related to your company's business activities which resulted in sending material to Chemetco.

**RESPONSE:**

UNFT was founded on March 19, 1996 under the name "Lake Rise". In May 1996, the entity changed its name to UNFT.

EPA alleged in its General Notice Letter and Information Request for the Chemetco Superfund Site to UNFT that, between 2000 and 2001 UNFT sent 1,504,358 pounds of the following materials to the Site: tin/muds, solder dross/soladura, tin dross and aluminum beverage cans. UNFT does not possess any documents which indicate that it sent any materials to the Site.

3. Describe and provide any documents related to your company's role at the Site, including what duties/involvement your company had at the Site.

**RESPONSE:**

UNFT did not, at any time, have any role, duties or involvement at the Site.

4. If the nature or size of Respondent's activities in relation to Chemetco changed over time, describe those changes and the dates they occurred.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

5. For each type of waste or material used in Respondent's operations, describe and provide documents relating to Respondent's contracts, agreements, or other arrangements for its disposal, treatment, trading, or recycling with Chemetco, including but not limited to whether Respondent controlled where waste sent to Chemetco warehouses was ultimately processed/recycled.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

6. If not already provided, specify the dates and circumstances when Respondent's waste or material was taken to the Site, and identify the companies or individuals who brought Respondent's waste/material to the Site. Provide any documents which support or memorialize your response.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

7. Were transactions between your company and Chemetco and specifically the Site:

1) an outright sale;

**RESPONSE:**

UNFT does not have any information responsive to the above question.



2) subject to a written or verbal "tolling" agreement between the companies; or

**RESPONSE:**

UNFT does not have any information responsive to the above question.

3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date?

**RESPONSE:**

UNFT does not have any information responsive to the above question.

8. Did your company have any influence over waste disposal or recycling activities at the Site? If so, how?

**RESPONSE:**

UNFT did not have any influence over waste disposal or recycling activities at the Site.

9. Was any shipment of material sent to the Site by Respondent ever refused and/or returned? If so, describe this event in detail, including its cause and outcome.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

10. Describe in detail the types of material that you sent for recycling, processing, or disposal at the Site. In your response, please also give the generic name of each type of materials shipped to the Site [e.g., scrap metal (including scrap automobiles), batteries, electronics, scrap paper, scrap plastic or scrap textile, etc.].

**RESPONSE:**

EPA alleged in its General Notice Letter and Information Request for the Chemetco Superfund Site to UNFT that, between 2000 and 2001 UNFT sent 1,504,358 pounds of the following materials to the Site: tin/muds, solder dross/soladura, tin dross and aluminum beverage cans. UNFT neither confirms nor denies that it sent these or any other materials to the Site. Other than the EPA materials, UNFT does not have any information responsive to the above question.

- (a) Identify whether the materials were delivered directly to the Site or were trans-shipped there from another intermediate delivery point. If applicable, describe each such delivery point.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (b) State whether any of the material was ever tested by your company and if so, whether the substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. § 261, Subpart C.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (c) Describe what was done to materials once they were brought to the Site, including any further processing of the materials.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (d) Provide any additional information and all documents that you believe are related to the type, nature and characteristics of the materials you sent to the Site.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (e) List the years in which your company sent materials to Chemetco and/or its broker(s) for recycling, processing, or disposal.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

Questions and Requests for Documents Related to Scrap Metal

11. For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:

- (a) Did a market exist for the scrap metal listed in your response to No. 10 above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of the commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (b) What commercial specification grade did the scrap metal listed in your response to question No. 10 meet? Identify/list the commercial specification grades that each scrap metal identified in No. 9 met.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (c) At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question No. 10? Did this include burning as fuel, or for energy recovery, or incineration?

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (d) After sale, transfer, delivery, recycling, or disposal, what portion of the scrap metal listed in your response to question No. 10 was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (e) Could the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a virgin raw material? If so, provide details.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (f) Could any products made from the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (g) Did your company melt the scrap metal listed in your response to question No. 10 before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (h) Describe the source of or the process that produced the materials sent to the Site.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

12. Did any of the scrap material sent to the Site contain other material(s) incident to or adhering to the scrap? If so, describe in detail.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

13. Did any of the material sent to the Site contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at the Site, after being received at the Site, or was the wire not stripped?

**RESPONSE:**

UNFT does not have any information responsive to the above question.

14. Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

15. Describe all efforts (i.e., Site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question No. 10.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

Questions and Request for Documents Related to Electrical and Electronic Equipment

16. For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers, monitors, cables, circuit boards, or other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:

- (a) List an estimated number of shipments of electrical and electronic equipment your company sent to the Site on an annual basis and list the years. In this list, include the type and quantity, volume and weight of electrical and electronic equipment sent;

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (b) At the time of the transaction(s), what was the intended deposition of the electrical and electronic equipment listed in your response to question 15(a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?

**RESPONSE:**

Not applicable.

17. With respect to waste or materials sent to the Site, at the time of the transactions, specify the measures you took to determine the actual means of treatment, disposal, recycling, or other uses of the material. Provide information you had and any documents relating to the treatment, recycling and disposal practices of Chemetco at the Site. What assurances, if any, were you given by the owner/operator of the Site regarding the proper handling and ultimate disposition of the materials you sent there, as well as its compliance with applicable environmental laws? Include in your response any correspondence to and from Chemetco relating to this topic and dates the measures were taken or assurances were given.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

18. What efforts and when, if any, did you take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering disposing of, trading, or arranging for the treatment, recycling, or disposal of any materials?

**RESPONSE:**

UNFT does not have any information responsive to the above question.

19. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials, particularly Section 127 of CERCLA, 42 U.S.C. § 9627, sent to the Chemetco Site.

**RESPONSE:**

UNFT does not have any information responsive to the above question.

20. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding scrap metal promulgated under Resource Conservation and Recovery Act (RCRA).

**RESPONSE:**

UNFT does not have any information responsive to the above question.

21. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

**RESPONSE:**

Not applicable.

22. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq.

**RESPONSE:**

Not applicable.

23. Identify the federal and state offices to which such information was sent. State the years during which such information was sent/filed.

**RESPONSE:**

Not applicable.

24. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

**RESPONSE:**

UNFT is not aware of any person or entity that may be able to provide additional responsive documents.

25. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained. If the records were destroyed, provide us with the following:

- (a) the document retention policy between 1970 and 2001;

**RESPONSE:**

UNFT was founded on March 19, 1996. UNFT does not have a written document retention policy; it follows applicable Hong Kong law, which requires documents to be retained for seven (7) years.

- (b) a description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction;

**RESPONSE:**

UNFT periodically destroys its documents by shredding. UNFT's most recent document destruction pursuant to its document retention policy occurred on December 2, 2011, prior to UNFT's receipt of the General Notice Letter and Information Request for the Chemetco Superfund Site in Hartford, Illinois, which was postmarked December 2, 2011 and received internally by UNFT on December 12, 2011.

- (c) a description of the type of information that would have been contained in the documents;

**RESPONSE:**

UNFT does not have any information responsive to the above question.

- (d) the name, job title and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for the destruction of these documents;



and the person(s) who had and/or still may have the originals or copies of these documents; and

**RESPONSE:**

Gert August van Steenberg  
Room 1901, 19/F., Hua Fu Commercial Building  
111 Queen's Road West  
Sheung Wan, Hong Kong

- (e) the names and most current address of any person(s) who may possess documents relevant to this inquiry.

**RESPONSE:**

UNFT is not aware of any person who may possess documents relevant to this inquiry.

26. Please state the name, title and address of each individual who assisted or was consulted in the preparation of the response to this information request.

**RESPONSE:**

Fin Borginon  
Metallum Finance NV  
Vaartstraat 59  
B – 2340 Beerse  
Belgium

Ken Rivlin  
Partner  
Allen & Overy LLP  
1221 Avenue of the Americas  
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